

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

TARENCE BANKS,

Plaintiff,

v.

Case No. 14-CV-0381

NURSE LESLIE, ET AL.,

Defendants.

SUPPLEMENTAL DECLARATION OF LESLIE PATTON

I, Leslie Patton, declare under penalty of perjury and pursuant to 28 U.S.C. § 1746 that the following is true and correct:

1. I am licensed as a registered nurse in the state of Wisconsin, and was so licensed during the time period in question. I have completed all training and education necessary to obtain such a license. My license has never been suspended or revoked.
2. I was employed by Correctional Healthcare Companies (“CHC”) as a registered nurse at all times relevant to this case. I provided on-site health care services to inmates at the Racine County Jail.
3. In my role as a registered nurse at the Jail, I had access to inmate medical records and charts, including progress and treatment notes, as well as written inmate requests for medical care (“medical slips”) and inmate grievances, and I have reviewed those documents for Banks as it pertains to this case, and make this declaration based upon my personal knowledge and my review of **Exhibit 1 (e-filed as Doc. 156-1)**, pertinent portions of Banks’ Racine County Jail medical records.

4. I provided care and treatment to Banks during November and December of 2013 and January of 2014.
5. Pages 10 and 11 of Doc. 156-1 are Banks' dressing change logs from December of 2013. I know this from my review of the documents and the fact that both pages have instructions with a December 2013 date on them.
6. Page 19 of Doc. 156-1 is Banks' dressing change log from November of 2013. I know this from my review of the document and the fact that charting begins in the middle of the month; Banks arrived at the jail from the hospital in mid-November.

Dated this 19th day of April 2016.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

s/ Leslie Patton
Leslie Patton